

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007.

Date filed: February 28, 2008

Name of company covered by this certification: Optivon Inc.

Form 499 Filer ID: 824894

Name of signatory: Rafael Morales

Title of signatory: VP of IT and Network Services

I, Rafael Morales, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: **Rafael Morales**

ATTACHMENT

Optivon, Inc. (OPTIVON) has established operating procedures for the compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- OPTIVON has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- OPTIVON educates and trains its employees regarding the appropriate use of CPNI. OPTIVON has created an employee manual that provides all related CPNI guidelines. Each employee is required to read the manual and sign a document stating he understands OPTIVON's policy regarding CPNI and will abide by the policy. OPTIVON has established disciplinary procedures should an employee violate the CPNI policy and procedures established by OPTIVON.
- OPTIVON maintains a record of the sales and marketing campaigns performed by its and its affiliates' where customers' CPNI are used. OPTIVON also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- A supervisory review process has been established by OPTIVON regarding compliance with the CPNI rules with respect to outbound marketing situations and records of OPTIVON compliance are kept for a minimum period of one year. Specifically, OPTIVON's sales force obtains supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.